

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROBERT SCHMIDT, RUSSELL
ADAMS,
and JASON TAYLOR
individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

JAGUAR Land Rover
AUTOMOTIVE PLC and
JAGUAR Land Rover
NORTH AMERICA, LLC,

Defendants.

Civil Action No. 2:18-cv-08528-CCC-JBC

**PLAINTIFFS' NOTICE OF MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND
AWARD OF CLASS REPRESENTATIVES' SERVICE PAYMENTS**

PLEASE TAKE NOTICE that on March 9, 2022 at 10:00 A.M., Plaintiffs Robert Schmidt, Russell Adams, and Jason Taylor, ("Plaintiffs" or "Class Representatives") individually and on behalf of all others similarly situated will move before the Honorable Claire C. Cecchi, U.S.D.J., of the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order: awarding class counsel attorneys' fees and expenses on the sum of seven hundred thousand

(\$700,000.00) dollars; and awarding each of the Class Representatives an incentive award of \$2,000 and for such other and further relief as to the Court appears just and proper.

This motion is based on Plaintiffs' Memorandum of Law In Support of the Motion for Approval of Award of Attorneys' Fees, Reimbursement of Expenses and Award of Class Representatives' Service Payments, the Joint Declaration of Class Counsel, the Declarations of Gary S. Graifman and Thomas P. Sobran, together with exhibits annexed thereto, and such other and further evidence to be offered in response to any objections or at the hearing.

Dated: January 4, 2022



Gary S. Graifman, Esq.

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&**

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Certified Class*